

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DIVISION OF ALABAMA
NORTHERN DIVISION

In the Matter of:
Clarence Vardman Jones
SSN: XXX-XX-6626
Sandra Faye Jones
SSN: XXX-XX-1326
Debtors

CASE NO: 13-82473-JAC13
Chapter 13

OBJECTION TO PROOF OF CLAIM
AND NOTICE OF OPPORTUNITY FOR HEARING

Comes now, **Clarence Vardman Jones and Sandra Faye Jones** the debtor(s), and objects to the Claim Number 15 filed by Exeter Finance Corp.. filed on August 19, 2013 in the amount of \$21,944.68 with interest accruing at 21.950%. The grounds alleged for the Objection are that under the case of *Till v. SCS Credit Corp.*, 124 S. Ct. 1951 (2004), the debtor(s) is entitled to pay interest on the secured claim at the plan rate of interest, not the contract rate of interest.

Wherefore, debtor(s) move(s) this Court to reduce the interest on the claim as filed by the claimant to the plan rate of interest of 5.25%.

NO HEARING WILL BE CONDUCTED ON THIS OBJECTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT AND A COPY SERVED ON THE PARTY FILING THIS OBJECTION AND THE CHAPTER 13 STANDING TRUSTEE WITHIN 30 DAYS FROM DATE OF SERVICE HEREOF, UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUEST FOR A HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THE OBJECTION TO PROOF OF CLAIM AS TO INTEREST SHALL BE DEEMED UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, IT WILL BE SET FOR A HEARING BEFORE THE JUDGE ON SEPTEMBER 30, 2013 AT 9:00 A.M. AT 3rd Floor Courtroom, 400 Wells Street, Decatur, AL 35602.

/s/ Stephen G. Campbell
STEPHEN G. CAMPBELL
Attorney for Debtor
P.O. Box 708
Athens, AL 35612
(256) 232-7354

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon the following by depositing copies of this objection in the United States mail, properly addressed and postage prepaid, on August 21, 2013.

Attention: Scott Beauchamp
Ascension Capital Group
Exter Finance Group
P.O. Box 201347
Arlington, TX 76006

Linda B. Gore
P.O. Box 2388
Decatur, AL 35602

/s/ Stephen G. Campbell
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